

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Kevin Khottavongsa, as Trustee
for the Heirs and Next of Kin of
Sinthanouxay Khottavongsa,

Court File No. 16-cv-1031 RHK/DTS

Plaintiff,

vs.

City of Brooklyn Center, Police Officers
Alan Salvosa, Cody Turner, and Gregg Nordby,
acting in their individual capacities as
City of Brooklyn Center Police Officers,

Defendants.

DECLARATION OF UZMA SAMADANI, MD PHD

I, UZMA SAMADANI, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I offer no new or supplemental opinions in this Declaration, but only expand on the opinions I issued in my Expert Report.
2. I have reviewed the Memorandum of Law in Support of Plaintiff's Motion to Exclude my Testimony, the Declaration of Robert Beatty, MD, and the medical literature Dr. Beatty cites in support of his conclusion.
3. In my report, I concluded it was impossible Mr. Khottavongsa sustained the scalp hematoma, frontal skull fracture, and underlying brain injury

from a fall to the back of the head. When questioned at my deposition regarding whether I had concluded a contrecoup fracture was impossible in this case I stated this was correct.

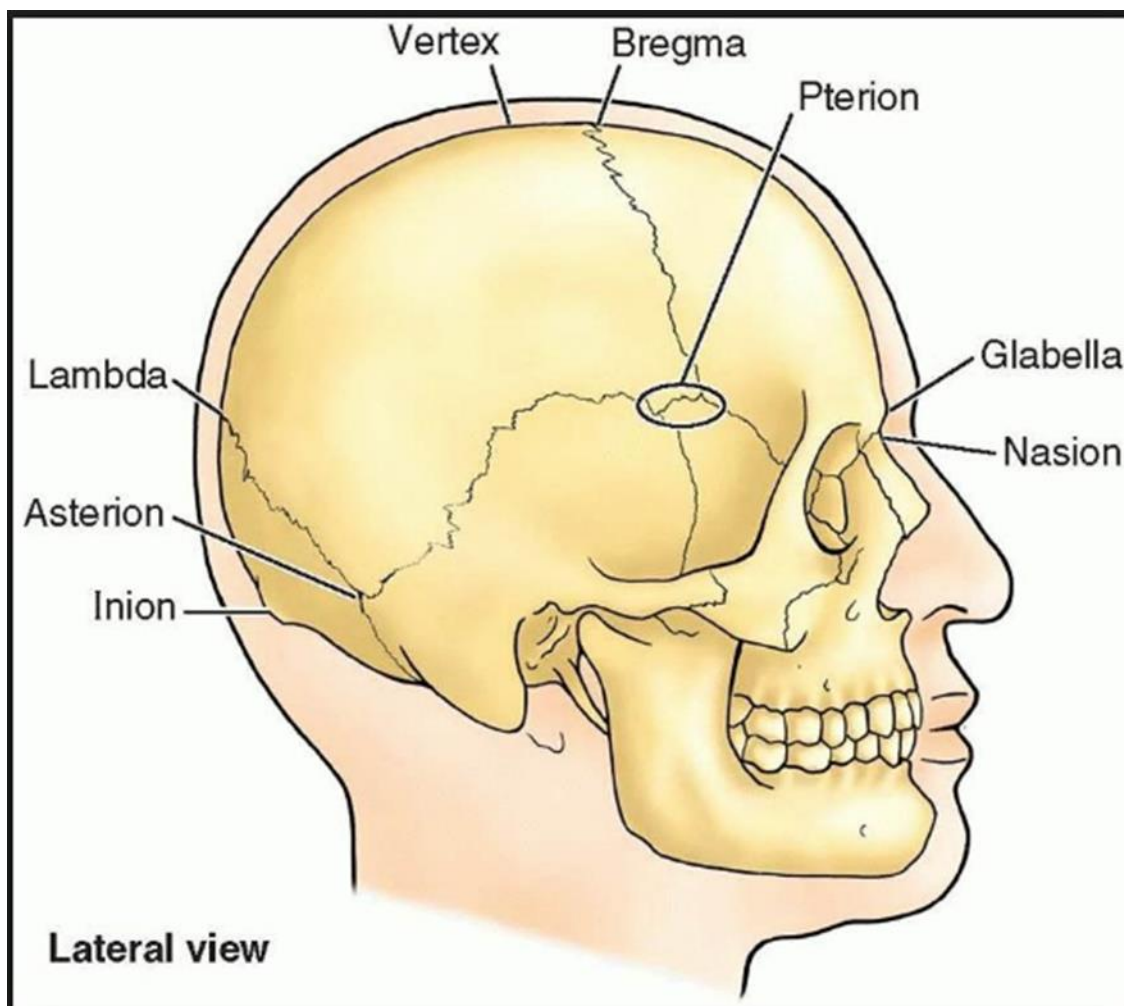
4. Upon review of the Memorandum of Law in Support of Plaintiff's Motion to Exclude my Testimony it appears Plaintiff's counsel understood my response to indicate that I concluded a contrecoup fracture was always impossible, rather than indicating my opinion as reflected in my report.

5. Upon review of the medical literature Dr. Beatty cites in support of his conclusion, I have found nothing to support the claim a fracture in the left frontal calvaria can result as a contrecoup injury from a blunt impact on the occiput.

6. According to the literature occipital blunt impact can result in "remote" skull base (anterior cranial fossa) fractures. Declaration of Robert Beatty, MD, Exhibit D at 3.

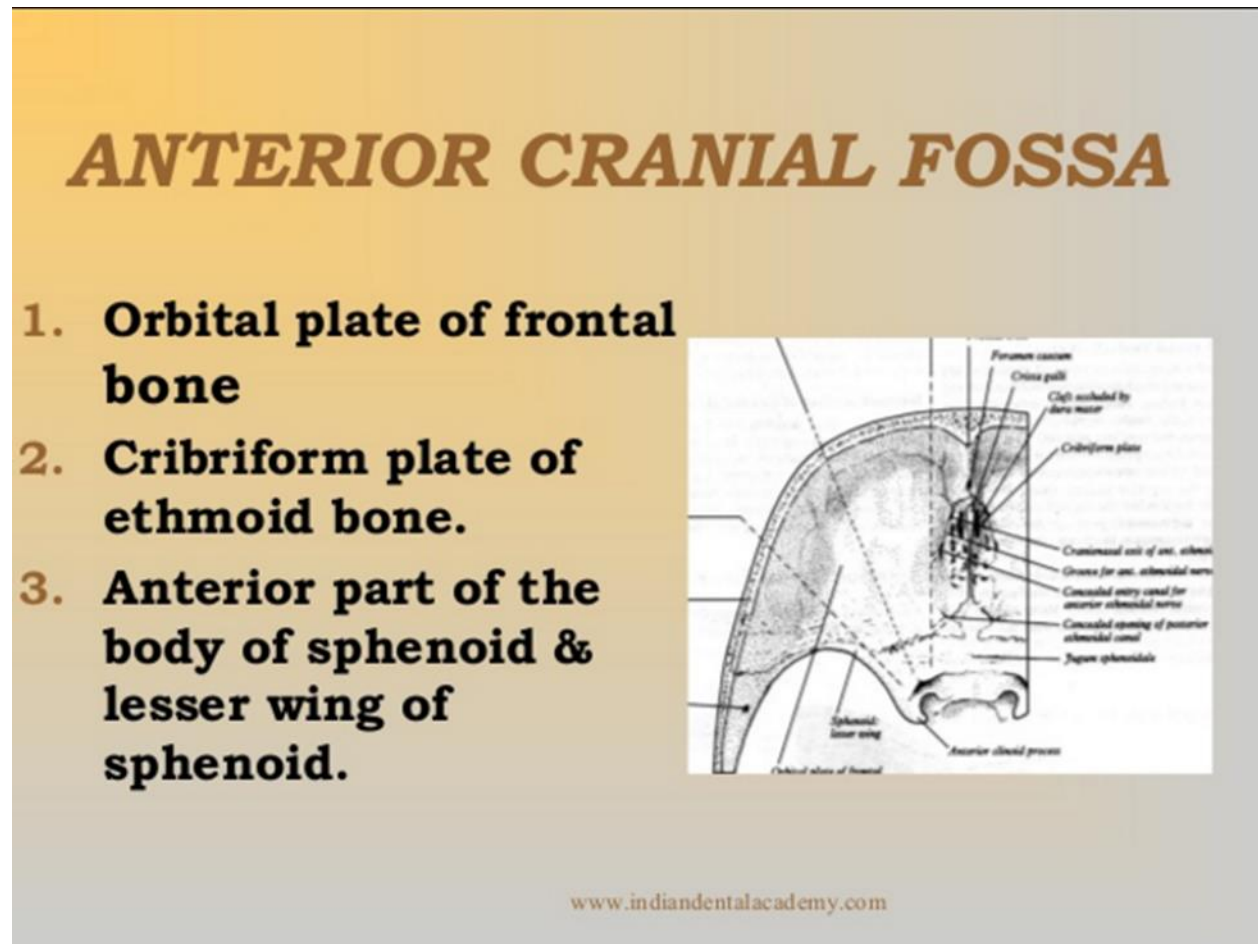
7. Also according to the literature, cranial vertex impact can result in linear calvarial fractures. Exs. D at 3, F at 3.

8. Khottavongsa exhibited a linear calvarial fracture, but the fall onto the back of K's head was not a blow to the cranial vertex, it was a blunt impact on the occiput (near the lambda in the photo below). The cranial vertex is the top of the head:



9. According to the literature remote fractures propagate along the lines of least resistance, toward the impact site. Ex. H at 4, Ex. A. Often the area of least resistance is not over the vault, and the various characteristic types of basilar skull fracture occur. Exs. H at 4, F at 4. Likewise, the literature recognizes that remote and contrecoup fractures occur at areas where the bone is the thinnest. Exs. H at 4, A, G, F at 4, K at 3, L at 2, M at 4.

10. The literature addressing contrecoup injuries either deals solely with contrecoup contusions, Exs. B, J, N, or contrecoup fractures in the anterior cranial fossa. Exs. I, K, L. The anterior fossa is part of the skull base:



11. None of the literature supports or describes any contrecoup fractures occurring above the orbital rim in occipital trauma, as Khottavongsa had suffered. All of the fractures are described as occurring in the thin bones of the basilar skull. According to the literature these bones are “translucently thin” and “fractures in such ‘egg shell’ areas are produced by trivial force compared to that required to fracture thicker parts of the skull.” Exs. I at 2, L at 2.

Dated: July 28, 2017

s/ Uzma Samadani
Uzma Samadani, MD PhD